

1 CANDICE JACKSON (SBN 224648)  
2 **FREEMAN MATHIS & GARY, LLP**  
3 1010 B Street, Suite 300  
4 San Rafael, California 94901  
5 Telephone: (415) 352-6434  
6 cjakson@fmglaw.com

7 LAUREN ADAMS (*Pro Hac Vice*)  
8 **WOMEN'S LIBERATION FRONT**  
9 1802 Vernon St. NW, #2036  
10 Washington, DC 20009  
11 Telephone: (202) 964-1127  
12 legal@womensliberationfront.org

13 *Counsel for Plaintiffs*

14

15 **UNITED STATES DISTRICT COURT**  
16  
17 **EASTERN DISTRICT OF CALIFORNIA (FRESNO DIVISION)**

18 JANINE CHANDLER, et al.,

19 Case No. 1:21-cv-01657-JLT-HBK

20 Plaintiffs,

21  
**DECLARATION OF KRYSTAL**  
**GONZALEZ IN SUPPORT OF**  
**PLAINTIFFS' OPPOSITION TO**  
**MOTION TO DISMISS**

22 v.

23 CALIFORNIA DEP'T OF CORRECTIONS  
24 AND REHABILITATION, et al.,

25 Defendants.

26

27 The declaration of Krystal Gonzalez follows:

28

29 ///

30 ///

31 ///

32  
33 **DECLARATION OF KRYSTAL**  
34 **GONZALEZ**  
35  
36 1:21-cv-01657-JLT-HBK

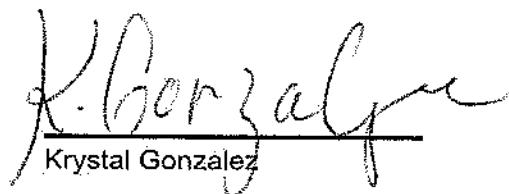
I, Krystal Gonzalez, hereby declare:

1. I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so as follows:
2. I am a Plaintiff in this lawsuit. I am an 33-year-old Hispanic woman currently incarcerated in CCWF. I have an 18-year-old daughter and a 3-year-old grandson.
3. I filed a 602 grievance, a true and correct copy of which was attached to the Defendants' Motion to Dismiss, which reported an incident of sexual assault and intimidation from a male inmate C.R. who had been placed in my unit under SB 132. In one encounter with C.R., he intentionally rubbed his penis on my backside. This has caused me ongoing distress, fear, and embarrassment. I went and disclosed to staff immediately, but nobody ever followed up and treated it seriously until I did a 602.
4. In my grievance I asked for single-sex housing because being housed with males, including C.R., places me and other women at risk of harm of sexual assault, other sex crimes, physical violence, and intimidation.
5. In the prison's response to my 602, attached to the Defendants' Motion to Dismiss, they refused to acknowledge that it was a man who committed the sexual assault. They call him a "transgender woman with a penis." This worsens my distress because I do not believe they can really evaluate my grievance if they are pretending that women can have penises. This man violated me, and when the prison tries to tell me it was a woman I feel violated again.
6. I do not know if C.R. even identifies as a "transgender woman." He does not look at all like a woman. I do not believe anybody could confuse him for female. He is big and acts like a man. The day he assaulted me he was dressed like a man, was wearing lipstick and had a braid in his hair, but wearing lipstick does not make you a woman. Women also do not have penises, and women do not go around molesting strangers and rubbing their genitals on other women to try to intimidate them. That is something men do.
7. I have interacted with several male offenders who have been transferred under SB 132, and not a single one looks or acts like women. They wear hats, t-shirts, they are bagging, sagging, everything. When they go see their counselor they will put on a bra and speak more softly, but on the yard they use their normal man voices. Some of them are even wearing chest binders to cover up breasts that developed while taking hormones. They don't respect women at all.
8. All of the ones I know of are in sexual relationships with women. More than one woman I know is having heterosexual sex and trying to get pregnant. If it hasn't happened already, it's just a matter of time.
9. I do not want to be away from trans people at all. I have no problem with transgender people. I respect people's identities, but I also think that women deserve to be safe while incarcerated and this law puts women at risk of rape, pregnancy, and other violence. I don't think anybody with a penis or who doesn't actually act like a woman should be allowed here. It is especially wrong to say that myself and the other Plaintiffs have problems with transgender people because we have lived with transmen (who are biological females) since the beginning, with no problems. They don't pose the same risk to us as biological males do, and it would not be safe for them to live in men's facilities, for the same reason it is not safe to have men here in the women's facilities. This is why

almost none of them have requested transfer to women's facilities, and why none of the transfer requests have been granted.

10. The housing rule is you cannot refuse to live with a man, or they will send you to jail. So if you feel unsafe your only option is to go to solitary. That is not right.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was executed on May 24, 2022 at Chowchilla, California.



A handwritten signature in black ink, appearing to read "K. Gonzalez".

Krystal Gonzalez